

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WORLDVIEW ENTERTAINMENT HOLDINGS INC.,  
WORLDVIEW ENTERTAINMENT HOLDINGS LLC,  
& ROSELAND VENTURES LLC,

Case No. 1:19-cv-06519 (JGK)

**NOTICE OF MOTION**

Plaintiffs,

- against -

CHRISTOPHER WOODROW, SARAH WOODROW,  
THE ESTATE OF CONSTANCE WOORDROW,  
GOETZ FITZPATRICK LLP AND AARON BOYAJIAN,  
ESQ.,

Defendants.

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**PLEASE TAKE NOTICE** that upon the annexed Declaration of Simon Block, dated August 12, 2019, together with the exhibits annexed thereto, the accompanying Memorandum of Law, dated August 12, 2019, and upon all of the prior papers and proceedings herein, the undersigned counsel for Plaintiffs Worldview Entertainment Holdings Inc., Worldview Entertainment Holdings LLC, and Roseland Ventures LLC, hereby moves this Court, before the Honorable John G. Koeltl, United States District Judge, in Courtroom 14A of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order, pursuant to 28 U.S.C. §§ 1447(c), 1334(c)(1) and 1452(a), remanding the entire above-captioned action (Supreme Court of the State of New York, New York County Index No. 159948/2014) to the Supreme Court of the State of New York, New York County, the state court from which it was removed, together with such further and other relief as the Court deems just and proper.

Dated: August 12, 2019  
New York, New York

QUINN McCABE LLP

By: 

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